

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

ALEX T. JARRELL, an individual,

Plaintiff,

v.

Case No.: 2:23-cv-00586-MLG-JHR

**CATTLE BARON RESTAURANTS, INC.;
MELANIE STEELE, Chief Executive Officer
of Cattle Baron Restaurants, Inc.; CLAYTON
WILSON, President of Cattle Baron Restaurants,
Inc; JOHN DOES I-X; JANE DOES I-X; BLACK
AND WHITE ENTITITES I-X,**

Defendants.

**JOINT MOTION TO DISMISS WITHOUT PREJUDICE ALL
CLAIMS AGAINST INDIVIDUAL DEFENDANT CLAYTON WILSON**

COMES NOW Defendants, Cattle Baron Restaurants, Inc. (hereinafter “Cattle Baron”) by and through their undersigned counsel Danny W. Jarrett and Linn E. Gillen of Jackson Lewis P.C. hereby with approval from Plaintiff’s counsel, Joe Zebas, submit this Joint Motion to Dismiss Without Prejudice All Claims Against Individual Defendant Clayton Wilson.

The parties agree that Mr. Wilson is an improper party to this lawsuit. The parties jointly move to have all claims in the lawsuit against Mr. Wilson be dismissed without prejudice and that Mr. Wilson be dismissed from this case.

Respectfully Submitted,

JACKSON LEWIS P.C.

By: /s/Linn E. Gillen

Danny W. Jarrett

Linn E. Gillen

500 Marquette Ave NW, Suite 1050

Albuquerque, NM 87102

(505) 878-0515

Linn.Gillen@jacksonlewis.com

Danny.Jarrett@jacksonlewis.com

Attorneys for Defendant

ZEBAS LAW FIRM, LLC.

By: /s/ Joseph M. Zebas (approved via email 11/14/24)

Joseph M. Zebas
502 West Alto Drive
Hobbs, NM 88240
(575) 393-1024
joe.zebas@zebaslaw.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November 2024, the foregoing was e-filed and served via the Court's CM/ECF system, which caused all parties or counsel below to be served as more fully reflected on the Notice of Electronic Filing:

Attorney for Plaintiff
Joseph M. Zebas
Zebas Law Firm, LLC
502 West Alto Drive
Hobbs, NM 88240
Phone: (575) 393-1024
joe.zebas@zebaslaw.com

JACKSON LEWIS P.C.

By: Linn E. Gillen
Linn E. Gillen